

ESTTA Tracking number: **ESTTA451770**

Filing date: **01/18/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Notice of Opposition

Notice is hereby given that the following party opposes registration of the indicated application.

Opposer Information

Name	The Plubell Firm, LLC
Granted to Date of previous extension	01/18/2012
Address	3429 Quebec Street, N.W. Washington, DC 20016 UNITED STATES
Correspondence information	Gary M. Nath The Nath Law Group 112 S. West Street Alexandria, VA 22314 UNITED STATES gbennett@nathlaw.com, dstarr@nathlaw.com Phone:703-548-6284

Applicant Information

Application No	85319594	Publication date	09/20/2011
Opposition Filing Date	01/18/2012	Opposition Period Ends	01/18/2012
Applicant	East West Bank 7th Floor 135 N. Los Robles Avenue Pasadena, CA 91101 UNITED STATES		

Goods/Services Affected by Opposition


Class 038. All goods and services in the class are opposed, namely: Providing an on-line forum for international relations

Grounds for Opposition

Priority and likelihood of confusion	Trademark Act section 2(d)
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Mark Cited by Opposer as Basis for Opposition

U.S. Registration No.	3448481	Application Date	09/28/2007
Registration Date	06/17/2008	Foreign Priority Date	NONE
Word Mark	EAST-WEST BUSINESS BRIDGE		

Design Mark	
Description of Mark	NONE
Goods/Services	Class 035. First use: First Use: 2003/01/04 First Use In Commerce: 2003/01/04 Providing business information and business consultation to others about requirements for doing business between China and other countries and facilitating the conducting of business transactions between China and other countries

Attachments	77291214#TMSN.jpeg (1 page)(bytes) Notice of Opposition.pdf (4 pages)(116050 bytes)
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Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/Gary M. Nath and Gregory G. Bennett/
Name	Gary M. Nath and Gregory G. Bennett
Date	01/18/2012

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Application Serial Number: 85/319,594
Application Filing Date: May 12, 2011
Mark: EAST WEST BRIDGE FORUM
Date of Publication: September 20, 2011

THE PLUBELL FIRM, LLC,)
)
Opposer,)
)
)
v.)
)
EAST WEST BANK,)
)
Applicant.)

NOTICE OF OPPOSITION

THE PLUBELL FIRM, LLC, a limited liability company organized and existing under the laws of Washington, District of Columbia, having a business address of 3429 Quebec St., N.W. Washington, DC 20016 (“Opposer”), believes that it will be damaged by registration of the mark “EAST WEST BRIDGE FORUM” shown in Application Serial No. 85/319,594 (the “Application”) with respect to Class 38, and hereby opposes same. The Application was filed on May 12, 2011 by East West Bank, which is alleged to be a corporation organized and existing under the laws of California, having a business address of 7th Floor 135 N. Los Robles Avenue Pasadena, CA 91101 (the “Applicant”), and is pending for the following services in Class 38:

“Providing an on-line forum for international relations” in Class 38.

The Application was published for opposition on September 20, 2011. Opposer has previously timely filed a request for extension of time to oppose the Application and said request was granted by the Board with the present extension of time set to expire on January 18, 2012.

As grounds for this opposition, Opposer alleges that:

1. Opposer is the owner of the Registration No. 3448481 for “EAST-WEST BUSINESS BRIDGE” (the “Registration”). Said Registration was registered on June 17, 2008, and is valid, subsisting, and unrevoked.

2. The Registration is registered for the following services in Class 35: “Providing business information and business consultation to others about requirements for doing business between China and other countries and facilitating the conducting of business transactions between China and other countries.”

3. Opposer has used and presently uses the mark “EAST-WEST BUSINESS BRIDGE” in connection with the provision of services identified in paragraph 2.

4. Since prior to the filing date of the Application, Opposer did use and has continuously used in interstate commerce the mark “EAST-WEST BUSINESS BRIDGE” with services described in paragraph 2 herein.

5. Applicant’s mark “EAST WEST BRIDGE FORUM” is likely to cause confusion or to deceive purchasers in the mistaken belief that the services of Applicant emanate from, are offered by, or are provided by Opposer or under Opposer’s approval, sponsorship or control, all to the great damage of Opposer.

WHEREFORE, Opposer prays that this Notice of Opposition be granted in favor of the Opposer and that Application Serial No. 85/319,594 be rejected, that no registration be issued thereon to Applicant, and this opposition be sustained to Opposer.

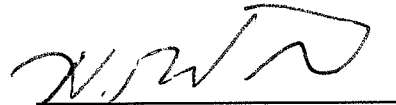
The required filing fee of \$300.00 is submitted herewith.

Opposer hereby appoints Gary M. Nath, H. David Starr and Gregory G. Bennett, all of the law firm of The Nath Law Group with offices at 112 S. West Street, Alexandria, Virginia 22314, to act as attorneys for the Opposer herein, with full power to prosecute said Opposition, to transact all relevant business with the U.S. Patent and Trademark Office and in the United States Courts.

It is requested that communications be conducted with the below attorney who is authorized to receive all official communications in connection with this Notice of Opposition:

H. David Starr
The Nath Law Group
112 S. West Street
Alexandria, Virginia 22314

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'G. M. Nath', written over a horizontal line.

Gary M. Nath
H. David Starr
Gregory G. Bennett
The Nath Law Group
112 S. West Street
Alexandria, VA 22314
(703) 548-6284 (phone)
(703) 683-8396 (facsimile)

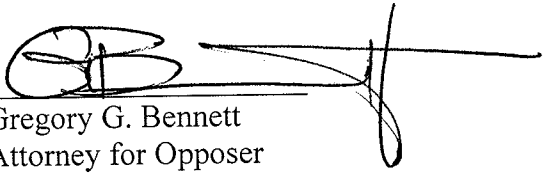
Attorneys for Opposer

Dated: January 18, 2012

CERTIFICATE OF SERVICE

This is to certify that I am on this date serving a copy of the within and foregoing upon the Applicant by depositing a true and correct copy of same in the United States Mail in an envelope with sufficient first class postage affixed thereon to ensure delivery, addressed as follows:

Thomas T. Chan
Chan Law Group LLP
PO Box 79159
Los Angeles, CA 90079-0159



Gregory G. Bennett
Attorney for Opposer

Date: January 18, 2012
THE NATH LAW GROUP
112 South West Street
Alexandria, VA 22314
(703) 548-6284 (tel.)
(703) 683-8396 (fax)